

IOWA DEPARTMENT OF WATER, AIR AND WASTE MANAGEMENT

Report Of Investigation

Page 1 Of 5

<p style="text-align: center;">INVESTIGATION DATE</p> <p>Current 1/4/84 Last</p>	<p>FROM: (Use Stamp) Region No. 6 P. O. Box 27 Washington, Iowa 52353</p>
<p>TO: (Facility Name, Location & Address) Sheller-Globe Corporation Keokuk Division 3200 Main St. Keokuk, IA 52632</p>	<p>Persons Contacted (Name & Position) Richard Adkins, Employment/Safety Spvr.</p>
<p>RE: (Specify Investigation Purpose Or Cite Rule) Hazardous Waste Inspection IAD005736023</p>	

OBSERVATIONS/RECOMMENDATIONS

This facility has interim status as a treatment, storage or disposal facility. This facility was inspected and found deficient in some administrative compliance areas. The storage of hazardous waste was also found deficient in that hazardous waste is still being co-stored with solid waste and there are containers in storage without tops and in poor structural shape.

NOTE: 40 CFR references are Federal hazardous waste rules as promulgated by EPA from May 19, 1980 through January 23, 1981 (Parts 260 - 265) and as adopted by the State of Iowa (900 I.A.C. 45) on January 20, 1981.



R00111018
RCRA RECORDS CENTER

SUSPENSE DATE	Signature	Date
<u>1/1</u>	Inspector David N. Whiting	1/12/84
	Regional Administrator Pro Tem Merritt W. Van Lier	1/20/84
Enclosures (Specify) (R. Vlieger)		
Distribution: Regional Office: Central Office: Inspected Facility: Greg Sautter		

HAZARDOUS WASTE MANAGEMENT FACILITY General Administrative Requirements Site Inspection Report Checklist	Instruction Answer and Explain as Necessary
<p>1. Waste Analysis [40 CFR 265.13 as incorporated in 400--45 (455B) I.A.C.]</p> <p>a. <u>Waste Analysis Plan</u> <input checked="" type="checkbox"/> <input type="checkbox"/> Adequate <input type="checkbox"/> <input checked="" type="checkbox"/> More Effort Required <input type="checkbox"/> <input type="checkbox"/> Inadequate 265.73(b) (3)</p> <p>& b. <u>Waste Analysis Results</u> (operating record)</p>	
<p>2. Security (264.14) [if applicable]</p> <p>a. <u>Access Control</u> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Adequate <input type="checkbox"/> <input type="checkbox"/> More Effort Required <input type="checkbox"/> <input type="checkbox"/> Inadequate <input type="checkbox"/> <input type="checkbox"/> Not Applicable</p> <p>& b. <u>Warning Signs</u></p>	
<p>3. Inspection (265.15)</p> <p>a. <u>Inspection Schedule</u> <input checked="" type="checkbox"/> <input type="checkbox"/> Adequate <input type="checkbox"/> <input checked="" type="checkbox"/> More Effort Required <input type="checkbox"/> <input type="checkbox"/> Inadequate 265.73(b) (5)</p> <p>& b. <u>Inspection Log</u> (operating record)</p>	
<p>4. Personnel Training (265.16)</p> <p>a. <u>Position Descriptions</u> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Adequate <input type="checkbox"/> <input type="checkbox"/> More Effort Required <input type="checkbox"/> <input type="checkbox"/> Inadequate</p> <p>& b. <u>Training Records</u></p>	
<p>5. Preparedness and Prevention Procedures (265.30 & 265.31)</p> <p>a. <u>Required Equipment</u> (265.32) <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Adequate <input type="checkbox"/> <input type="checkbox"/> More Effort Required <input type="checkbox"/> <input type="checkbox"/> Inadequate <input type="checkbox"/> <input type="checkbox"/> Not Applicable</p> <p>b. <u>Testing and Maintenance of Equipment</u> (265.33)</p> <p>c. <u>Access to Communications or Alarm Systems</u> (265.34) <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Adequate <input type="checkbox"/> <input type="checkbox"/> More Effort Required <input type="checkbox"/> <input type="checkbox"/> Inadequate <input type="checkbox"/> <input type="checkbox"/> Not Applicable</p> <p>d. <u>Required Aisle Space</u> (265.35)</p> <p>e. <u>Arrangements with Local Authorities</u> (265.37) <input checked="" type="checkbox"/> Adequate <input type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate <input type="checkbox"/> Not Applicable</p>	
<p>6. Emergency Procedures (265.56)</p> <p>a. <u>Contingency Plan</u> (265.52) <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Adequate <input type="checkbox"/> <input type="checkbox"/> More Effort Required <input type="checkbox"/> <input type="checkbox"/> Inadequate</p> <p>& b. <u>Instruction on Contingency Plan</u> (training records)</p> <p>c. <u>Summary and Details of Implementation of Contingency Plan</u> <input type="checkbox"/> Adequate <input type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate <input type="checkbox"/> Not Applicable</p>	
<p>7. Waste Accountability</p> <p>a. <u>Manifests - HW Received & Shipped</u> (265.71 & 262.23) <input checked="" type="checkbox"/> Adequate <input type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate <input type="checkbox"/> Not Applicable</p> <p>b. <u>Description & Location of HW within Facility</u> (operating record) (265.73) <input type="checkbox"/> Adequate <input checked="" type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate <input type="checkbox"/> Not Applicable</p>	
<p>8. Closure</p> <p>a. <u>Closure Plan</u> (265.112) <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Adequate <input type="checkbox"/> <input type="checkbox"/> More Effort Required <input type="checkbox"/> <input type="checkbox"/> Inadequate</p> <p>& b. <u>Closure Cost Estimate</u> (265.142)</p> <p>c. <u>Financial Assurance for Facility Closure</u> (265.143 - by 4/13/82) <input type="checkbox"/> Adequate <input checked="" type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate</p>	
<p>9. Post-Closure (Disposal Facility)</p> <p>a. <u>Post-Closure Plan</u> (265.118) <input type="checkbox"/> <input type="checkbox"/> Adequate <input type="checkbox"/> <input type="checkbox"/> More Effort Required <input type="checkbox"/> <input type="checkbox"/> Inadequate</p> <p>& b. <u>Post-Closure Cost Estimate</u> (265.144)</p> <p>c. <u>Financial Assurance for Post-Closure Monitoring & Maintenance</u> (265.145 - by 4/13/82) <input type="checkbox"/> Adequate <input type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate</p>	
<p>10. Liability Insurance (265.147 - by 4/13/82)</p> <p><input type="checkbox"/> Adequate <input checked="" type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate</p>	

Company Name Keokuk DivisionDate of Inspection 1/4/84IAD 0 0 5 7 3 6 0 2 3STORAGE FACILITIES SITE INSPECTION REPORT CHECKLIST
11 (Containers)Instruction
Answer and Explain
as Necessary

a. Condition of Container (265.171)

☐ Adequate☐ More Effort Required

& b. Management of Containers (265.173)

☒ ☒ Inadequate

c. Inspections (265.174)

☒ Adequate☐ More Effort Required☐ Inadequate

d. Special Requirements for Ignitable Waste (265.176) & e. Special Requirements for Incompatible Waste (265.177)

☒ ☒ Adequate☐ More Effort Required☐ Inadequate☐ Not Applicable

f. Security

☒ ☒ Adequate☐ More Effort Required

& g. Required Emergency Response Equipment

☐ Inadequate☐ Not Applicable

h. Containment (264.175)

☐ Adequate☒ More Effort Required☐ Inadequate

i. Estimated Type and Number of Containers

See body of report

j. Labeling/Marking on Containers (262.31, 32, 34)

☒ Adequate☐ More Effort Required☐ InadequateSTORAGE AND/OR TREATMENT FACILITIES SITE INSPECTION REPORT CHECKLIST
12 (Tanks)Instruction
Answer and Explain
as Necessary

a. Condition of Tanks (265.192)

☐ Adequate☐ More Effort Required☐ Inadequate

b. Uncovered Tank Requirements (265.192)

☐ Adequate☐ More Effort Required

& c. Tank with Continuous Feed Requirement (265.192)

☐ Inadequate☐ Not Applicable

c. Inspection (265.194)

☐ Adequate☐ More Effort Required☐ Inadequate

e. Special Requirement for Ignitable or Reactive Wastes (265.198)

☐ Adequate☐ More Effort Required☐ Inadequate☐ Not Applicable

f. Security

☐ Adequate☐ More Effort Required

& g. Required Equipment

☐ Inadequate☐ Not Applicable

Sheller-Globe, Keokuk Division

IAD005736023

1.a. Waste Analysis - Waste Analysis Plan

Sheller-Globe had the containers of flammable liquids and solvents analyzed by Waste Research and Reclamation of Eau Claire, Wisconsin. Additional analyses and efforts by this facility have resulted in their identifying the contents of all containers of wastes in storage.

- 1.b. Waste Analysis - Waste Analysis Results (Operating Records)
- 3.b. Inspection - Inspection Log (Operating Records)
- 7.b. Waste Accountability - Description and Location of Hazardous Waste within the facility (Operating Records)

An operating record has been developed and put into use since the last inspection. A copy of the form of the operating record is attached. The operating record needs to be amended to include information on, or a cross reference to, information on the following:

- 1. Waste Analysis Results
- 2. Records and results of inspections required by 40 CFR Sec. 265.15(d).
- 4.a. Personnel Training - Personnel Position Descriptions

During this inspection it was agreed to add language to the hourly employees' existing job descriptions. The purpose of the added language is to comply with 40 CFR Sec. 265.16(d)(2).

8.c. Closure - Financial Assurance for Facility Closure

The required financial assurance is not on file. Mr. Greg Sautter, P.E., Corporate Manager of Environmental Activities, has indicated this facility will be in compliance with 40 CFR Sec. 265.143 requirements by March 1, 1984.

10. Liability Insurance

The required liability insurance is not on file. Mr. Sautter indicated this facility will comply with 40 CFR Sec. 265.147 requirements by March 1, 1984.

11.a., b. Storage Facilities, Containers - Condition and Management

The storage area was somewhat as in the previous inspections and visits. There are still containers without tops, containers that are structurally weak, and at least two areas where the snow was discolored by leaks from the containers. Co-storage, i.e. the storage of hazardous waste alongside the solid waste, is still in practice in this facility.

11.h. Storage Facilities - Containment

There is not containment at the hazardous waste storage area for this facility. While it is not required at this point in time, it is recommended that some type of containment be constructed around the storage area to prevent any spills and leaks from escaping the storage area.

Sheller-Globe, Keokuk Division

IAD005736023

11.i. Storage Facilities, estimated type and number of containers

There are a total of 588 - 55 gal. drums in storage at this facility. Not all of the containers are full. There are: 160 drums of paint solids; 148 drums of flammable solvents; 16 drums of isocyanates; 59 drums of solids and solvents; 4 drums of wax and solvents; 20 drums of wax; 16 drums of Mastic; 40 drums of reacted foam; 55 drums of liquid activators; 30 drums of adhesives (it is not known if they are solvent base or water base); 49 drums of zinc stearate. Of the 148 drums of flammable solvents 89 are too high in solids content for Waste Research and Reclamation to accept. Of those 89, 39 are transportable drums and 50 are not.

The Part A for this facility lists the design storage capacity of the container storage area as 11,000 gals. (200 - 55 gal. barrels). Present storage is in excess of 11,000 gals. This must be corrected and it is recommended your Part A be amended or revised.

The storage area presently in use is somewhat different from that indicated on the Part A. The Part A should be revised to indicate the fenced in area south and west of the adhesives building as the designated hazardous waste storage area.

SUMMARY OF RECOMMENDATIONS

- 1) Correct all areas of storage non-compliance as soon as possible.
The best way to achieve this would be to ship off-site all containerized hazardous and solid waste for proper disposal.
- 2) Clean up all areas of leaks and spills in the container storage area.
- 3) Modify the operating record as outlined under item codes 1.b., 3.b. and 7.b.
The use of an operating record will help maintain an orderly container storage system and area.
- 4) Add language to the hourly employees' existing job descriptions that will comply with the requirements of 40 CFR Sec. 265.15(d)(2).
- 5) Comply with 40 CFR Sec. 265.43, financial assurance for closure, by March 1, 1984.
- 6) Comply with 40 CFR Sec. 265.147, liability insurance requirements, by March 1, 1984.

OPERATING RECORD
HAZARDOUS WASTE

TYPE OF WASTE	EPA WASTE NUMBER	WASTE PHYSICAL FORM	QUANTITY OF WASTE (LB)	STORAGE METHOD*	STORAGE AREA (PAINT RM) OR OUTSIDE	DATE OF STORAGE	REMARK
1.							
2.							
3.							
4.							
5.							
6.							
7.							
8.							
9.							
10.							
11.							
12.							
13.							
14.							
15.							
16.							

* For storage in 55 gal. drum -
method code - S01
For storage in tank - method code -
S02



department of water, air and waste management

January 24, 1984

Roger L. Bertraw, Division General Manager
Sheller Globe Corporation
3200 Main St.
Keokuk, Iowa 52632

RECEIVED
JAN 26 3 55 PM '84

DEPARTMENT OF
WATER, AIR AND
WASTE MANAGEMENT

RE: RCRA Hazardous Waste Inspection

Dear Mr. Bertraw:

Enclosed is a hazardous waste inspection report of your facility. We believe that you will find the report self-explanatory and concur with report recommendations.

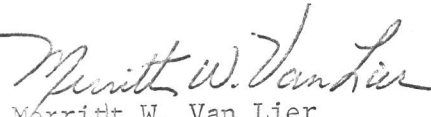
Due to the lack of continued noted progress by your facility to come into compliance with hazardous waste regulations and requirements, this office is referring your facility to our legal section for appropriate legal action. Specific problems need to be corrected regarding your container storage operation.

Mr. Whiting has required that by March 1, 1984, financial assurance for closure and liability insurance requirements be met. Follow-up inspections will be conducted to determine future compliance with noted deficiencies.

Should you have any questions or would like to discuss this report further, feel free to contact our office.

Sincerely,

Field Services Division


Merritt W. Van Lier
Acting Regional Administrator
Field Office No. 6

MWV:SH:h

xc: ✓ Rod Vlieger, WAWM, Des Moines
EPA Region VII, Kansas City
Greg Sautter, Toledo Ohio
File

*Request for Administrative
order forwarded separately
to Bill Anderson
1/25/84*